DOJ PROPOSED LANGUAGE FOR MAXUS DISCOVERY ORDER AND PROTOCOL

11/8/16

Revise the last sentence of Paragraph 1 of the Order as follows: "For the avoidance of doubt, this Order shall not affect the rights of the Debtors, the YPF Entities, any Participant, or any other party-in-interest in connection with any other contested matter or adversary proceeding in these chapter 11 cases including, without limitation, the right to argue that the Settlement Motion should not be adjudicated until such time as the Court is also adjudicating whether the Proposed Plan, or some other plan, should be confirmed.

Add the following new paragraph at the end of the E-Discovery Protocol:

With respect to any discovery sought of the United States or any of its departments or agencies ("U.S. Government"), this Protocol is modified as follows: (a) with respect to the Metadata Fields on the list attached hereto, the U.S. Government shall not be required to provide LOCATION information for Lotus Notes e-mail, and shall not be required to provide CREATEDATE, LASTMODDATE, LSTEDITBY, or LASTACCESSED information for any documents; (b) with respect discovery seeking Excel or other spreadsheets, the U.S. Government may provide native format as set forth in Paragraph 3 and shall be required to produce TIFF images only upon reasonable request, (c) with respect to text files referred to in Paragraph 8, if a document contains redaction the U.S. Government may provide OCR text instead of extracted text.